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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,
vs.
Plaintiff,
TIMOTHY PATTAN,
Defendant.

Case No. 1:21-CR-00009 DBB
INITIAL NOTIFICATION OF
COMPLIANCE AND REQUEST FOR
RECIPROCAL DISCOVERY

Judge David B. Barlow

The United States of America, by and through the undersigned, hereby files its initial notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following is being or has been provided to counsel for the defendant via *USAfx*:

Discovery produced:	Date Numbered Documents:
NOC 01	See attached Discovery Index

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

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The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 8th day of October, 2021.

ANDREA T. MARTINEZ
Acting United States Attorney

/s/ Branden B. Miles

BRANDEN B. MILES
Special Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing INITIAL NOTIFICATION OF COMPLIANCE was made available to all parties identified below on October 8, 2021.

Tessa Hansen
Attorney for Defendant T. Pattan
Office of the Federal Public Defender - Utah
46 W. Broadway, Suite 110
Salt Lake City, Utah 84101

/s/ Beth Z. McAlpin
Beth Z. McAlpin
Legal Administrative Specialist

		US V. Timony - Patten DISCOVERY INDEX					
CATEGORY	FOLDER NAME	DESCRIPTION	BATES BEGIN	BATES END	RELATED	SOURCE	NOC
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1659.mp4	BC-WMSF-01-00001	BC-WMSF-01-00001		Agent	1
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1700.mp4	BC-WMSF-01-00002	BC-WMSF-01-00002		Agent	1
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1702.mp4	BC-WMSF-01-00003	BC-WMSF-01-00003		Agent	1
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1704.mp4	BC-WMSF-01-00004	BC-WMSF-01-00004		Agent	1
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1710.mp4	BC-WMSF-01-00005	BC-WMSF-01-00005		Agent	1
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1730.mp4	BC-WMSF-01-00006	BC-WMSF-01-00006		Agent	1
Media	WMSF Bodycams	AXON_Body_2_Video_2020-07-13_1745.mp4	BC-WMSF-01-00007	BC-WMSF-01-00007		Agent	1
Background	Criminal History	III report	BG-TWP-01-00001	BG-TWP-01-00001.02		Agent	1
Background	Criminal History	OTRACK report	BG-TWP-01-00002	BG-TWP-01-00002.02		Agent	1
Background	Criminal History	UBI report	BG-TWP-01-00003	BG-TWP-01-00003.16		Agent	1
Media	Case Photos	IMG_1721	PH-01-00001	PH-01-00001		Agent	1
Media	Case Photos	IMG_1723	PH-01-00002	PH-01-00002		Agent	1
Media	Case Photos	IMG_1731	PH-01-00003	PH-01-00003		Agent	1
Media	Case Photos	IMG_1732	PH-01-00004	PH-01-00004		Agent	1
Media	Case Photos	IMG_1733	PH-01-00005	PH-01-00005		Agent	1
Media	Case Photos	IMG_1734	PH-01-00006	PH-01-00006		Agent	1
Media	Case Photos	Photograph 20SO6085	PH-01-00007	PH-01-00007		Agent	1
Investigative	UBFS Lab Report	State Crime Lab N2020-0783	RPT-UBFS-01-00001	RPT-UBFS-01-00001.03		Agent	1
Investigative	WMSF Police Rpt	SOPD 20SO6085	RPT-WMSF-01-00001	RPT-WMSF-01-00001.21		Agent	1
Investigative	WMSF Police Rpt	SOPD 20SO6092	RPT-WMSF-01-00002	RPT-WMSF-01-00002.05		Agent	1
Investigative	WMSF Police Rpt	WMSNF 20N-464	RPT-WMSF-01-00003	RPT-WMSF-01-00003.08		Agent	1
Background	State Court	Forfeiture Order 200904466	SC-01-00001	SC-01-00001.02		Agent	1
Search Warrant	Search Warrant	SEARCH WARRANT 2120811	SW-01-00001	SW-01-00001.11		Agent	1